

★ DEC 28 2021 ★

BROOKLYN OFFICE

December 19, 2021

Delivery via First-Class Mail (USPS)

The Honorable Raymond J. Dearie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201



re: United States v. Andre Wilburn, case No. 19-CR-139(RJD)

Dear Judge Dearie:

The defendant, Andre Wilburn, without waiving any other motions, and to be considered in addition to and in connection with any previously submitted motions and any previously submitted or future Speedy Trial Motions, respectfully writes the Court to assert his Constitutional Speedy Trial right pursuant to the Sixth Amendment to the United States Constitution. As a basis, the defendant sets forth the following:

Although the Fifth Amendment due process clause is the typical remedy for sentencing delays, the fact that as of the date of this letter, the Court has yet to formally accept the defendant's guilty plea on-the-record translates to the Sixth Amendment "speedy trial clause appl[ying] with full force." *United States v. Roberts*, 515 F.2d 642 (2d Cir. 1975).

Therefore, the defendant would like to formally assert his speedy trial right on-the-record.

I affirm under penalty of perjury that the foregoing is true and correct.  
Executed on December 19, 2021.

FILED  
IN CLERK'S OFFICE  
BROOKLYN COURTHOUSE N.Y.

\* DEC 5 8 SOSI \*

PRO SE OFFICE

Respectfully submitted,

Andie Wilburn

Andie Wilburn # 73608-298

MDC Brooklyn

P.O. Box 329002

Brooklyn, Ny 11232



Andre Wilburn #73608298  
MDC Brooklyn  
P.O. Box 329002  
Brooklyn, NY 11232

NEW YORK NY 100

20 DEC 2021 PM 6 L



The Honorable Judge Raymond J. Dearie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201



11201-193299

MAIL CENTER

RECEIVED  
MAY 29 1968

MAIL CENTER  
FBI - MEMPHIS

Mr.  
80 2914-1148  
The enclosed letter was processed to you  
The procedures for forwarding mail inspected over  
mail procedures, resulted in a problem over  
the letter, or as a question of what you may wish  
to do, if the letter contains a forged name, you may wish  
to return the material for further information  
If the letter contains a forged name, you may wish  
to return the material for further information  
or classification. If the letter is addressed,  
for forwarding to another address,  
return the enclosure to the above address.

MRW  
SAC